



**DEPARTMENT OF THE ARMY**  
HEADQUARTERS, 7<sup>th</sup> INFANTRY DIVISION AND FORT CARSON  
FORT CARSON, COLORADO 80913-5000

REPLY TO  
ATTENTION OF  
AFZC-ECM-BES (200)

18 May 2004

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: National Environmental Policy Act (NEPA) Compliance and Support Policy

1. REFERENCES.

- a. The National Environmental Policy Act (NEPA), 42 U.S.C. 4321-4347.
- b. AR 200-2, Environmental Analysis of Army Actions, currently published at 32 CFR Part 651.
- c. AR 200-1, Environmental Protection and Enhancement, 21 February 1997.

2. PURPOSE. This memorandum establishes the Garrison Commander's policy for supporting preparation of environmental documents and designates the Directorate of Environmental Compliance and Management (DECAM) as the lead activity for administration of this policy.

3. APPLICABILITY. This policy applies to all directorates and Army activities on Fort Carson and the Piñon Canyon Maneuver Site (PCMS).

4. REGULATORY REQUIREMENTS.

- a. Under 32 CFR 651.1(e) and 32 CFR 651.14, all units, organizations, and activities on Fort Carson and PCMS are required to comply with NEPA requirements for consideration of environmental consequences early in the planning process of proposed actions.
- b. Under 32 CFR 651.4 (q), a proponent of a proposed action has the responsibility to prepare and/or secure funding for preparation of NEPA documentation. In general, the proponent is the unit, element, or organization that is responsible for carrying out the proposed action.
- c. Under 32 CFR 651.4(p) and (q), environmental officers are the staff points of contact for NEPA matters, including review of environmental documentation, however prepared, to ensure compliance with applicable laws and regulations and assistance in monitoring compliance with mitigation measures in environmental documents.
- d. Army Regulation 200-1, paragraph 15-6, requires the preparation of an Environmental Baseline Survey (EBS) in support of certain real property transactions. These real property

transactions often support a proposed action such as privatization activities, public-private ventures, or contractor-owned/contractor-operated projects.

5. HIGHER HEADQUARTERS POLICY. Since funding for the preparation of NEPA documentation is the proponent's responsibility, the Installation Management Agency (IMA) will no longer provide funding to DECAM for the preparation of such documentation (Records of Environmental Consideration (RECs), Environmental Assessments (EAs), and Environmental Impact Statements [EISs]).

6. FORT CARSON POLICY.

a. The DECAM will continue to provide oversight for NEPA compliance and advise proponents on the NEPA process to ensure adequacy and support for the proposed action in accordance with 32 CFR 651. The DECAM must review and concur in all RECs, EAs, and EISs.

b. In view of the detailed environmental requirements involved, DECAM will prepare all required EBSs for Fort Carson real estate transactions. Proponents will be responsible for funding the costs of EBSs.

c. In addition to EBSs, DECAM may also support preparation of other environmental documents, on a reimbursable basis. The following table contains the type of documents the DECAM can support and an approximation of cost to prepare. Preparation of EAs and EISs by proponents is not recommended as these documents are technical in nature and must meet numerous legal requirements. However, proponents may be able to prepare RECs themselves. The DECAM NEPA personnel can provide blank REC forms upon request. Proponents must submit completed RECs to DECAM for review, concurrence, and approval. Documents required in order to complete the environmental documentation for a proposed action are covered in FC Reg 200-1, Chapter 2.

Type of Document	Time to Complete*	Cost
REC	10 – 30 working days	\$100 - \$2,000
EA	3 – 6 months	\$5,000 - \$100,000+
EIS	1 – 2 years	\$100,000 - \$1,000,000+
EBS/real estate support documents	20 – 40 working days	\$1,000-\$20,000

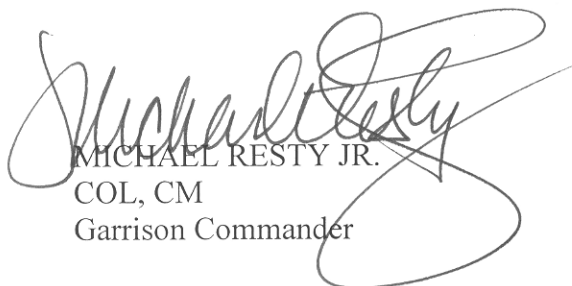
\*Time to complete is dependent upon the complexity of the proposed action, receipt of funding, and adequate project documentation.

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d. Proponents also have the option of arranging for contracting the preparation of these documents through a private contractor. The DECAM must review and approve the Statement of Work, all information released to the public and the Federal Register, and all drafts of contractor-prepared documents. These documents must also be reviewed by the Office of the Staff Judge Advocate for legal sufficiency and approved at the appropriate command level.

7. The DECAM POCs for this issue are Robin L. Romero at 526-0912, Vicki McCusker at 526-6210, Debi Owings at 526-4666, or Jeff Linn at 526-3975.



MICHAEL RESTY JR.  
COL, CM  
Garrison Commander

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